

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA  
Richmond Division**

**UHURU BARAKA ROWE,**

Plaintiff,

v.

Civil Action No. **3:19CV418**

**TRACY S. RAY, et al.,**


Defendants.

**MEMORANDUM ORDER  
(Denying Motion for Appointment of Counsel)**

Plaintiff, a Virginia state prisoner proceeding *pro se* and *in forma pauperis*, submitted this action pursuant to 42 U.S.C. § 1983. Plaintiff moves the Court for the appointment of counsel. (ECF No. 33.) Counsel need not be appointed in § 1983 cases unless the case presents complex issues or exceptional circumstances. *See Fowler v. Lee*, 18 F. App'x 164, 166 (4th Cir. 2001) (citation omitted). This action presents no complex issues or exceptional circumstances. Additionally, Plaintiff's pleadings demonstrate that he is competent to represent himself in the action. Accordingly, Plaintiff's motion for the appointment of counsel (ECF No. 33) is DENIED WITHOUT PREJUDICE.

The Clerk of the Court is DIRECTED to send a copy of the Memorandum Order to Plaintiff and counsel of record.

It is so ORDERED.

/s/   
\_\_\_\_\_  
Roderick C. Young  
United States Magistrate Judge

Date: August 11, 2020  
Richmond, Virginia